REDACTED FOR PUBLIC INSPECTION

Dysart Reply Affidavit – Attachment H

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Joint Application by SBC Communications	)	
Inc., Southwestern Bell Telephone Company,	)	
and Southwestern Bell Communications	)	CC Docket No. 01-194
Services, Inc. d/b/a Southwestern Bell Long	)	
Distance for Provision of In-Region,	)	
InterLATA Services in Arkansas and Missouri	)	

JOINT APPLICATION BY SOUTHWESTERN BELL FOR PROVISION OF IN-REGION, INTERLATA SERVICES IN ARKANSAS AND MISSOURI

Reply Appendix

VOLUME 2

Tabs 5 – 16

JOINT APPLICATION BY SOUTHWESTERN BELL FOR PROVISION OF IN-REGION, INTERLATA SERVICES IN ARKANSAS AND MISSOURI
CC Docket No. 01-194

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In the Matter of	)	
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Joint Application by SBC Communications	)	
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JOINT REPLY AFFIDAVIT OF WILLIAM R. DYSART, BRIAN D. NOLAND, NANCY L. RENTLER, AND DAVID ROSS SMITH

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The undersigned, being each of lawful age and duly sworn upon by oath, do hereby state as follows:

INTRODUCTION AND QUALIFICATIONS

1. My name is William R. Dysart. I am the same William R. Dysart who previously filed an affidavit in this proceeding, which provides my relevant experience and qualifications.

2. My name is Brian D. Noland. I am the same Brian D. Noland who previously filed an affidavit in this proceeding, which provides my relevant experience and qualifications.

3. My name is Nancy L. Rentler. My business address is 4515 Ocean View Blvd., Suite 300, La Canada, California 91011. I am General Manager, Repair Systems Support, Network Services Staff. In this position, I am responsible for an organization supporting Operational Support Systems (OSS), including LMOS, for SBC Network Services in 12 states. I reported to my current position effective August 1, 2001 and have utilized a 45-day period for transition of responsibilities from Daniel Jay Coleman to myself. Mr.

Coleman has assumed other job responsibilities within the Network Services Staff organization, and currently is out of the country on personal business.

4. I received my BA in Business Administration from California Lutheran University, Thousand Oaks, CA in 1990. I have been employed by Pacific Bell/SBC Communications, Inc. in various capacities since 1978. I have led and managed Presidential Support Staff teams and led and managed various front line teams within the Provisioning and Maintenance Centers and Local Field Operations.

5. My name is David R. Smith. I am the same David R. Smith who previously filed an affidavit in this proceeding, which provides my relevant experience and qualifications.

PURPOSE OF AFFIDAVIT

6. This affidavit replies to the comments of AT&T, WorldCom and DOJ concerning alleged problems with SWBT's LMOS database. Specifically, this affidavit demonstrates that UNE-P updates to the LMOS database occur in a timely manner, enabling CLECs to open electronic trouble tickets on an extremely high percentage of those lines during the first few days after installation.

TIMELINESS OF DATABASE UPDATES

7. The complaints of AT&T and WorldCom focus almost entirely on the timeliness of the LMOS update process.[1]

8. The overall results of LMOS/CABS database comparisons provided as Attachments B-E of the LMOS Affidavit have not been challenged. See LMOS Aff. App. A-AR, Tab 5 and App. A-MO, 4 to SWBT's initial AR/MO Application (LMOS Affidavit). Taken

[1] AT&T's Willard/Van de Water Decl. ¶ 16, wrongly claims "SWBT acknowledges" that, prior to implementation of the LMOS enhancements, its systems failed to post D and C orders in sequence for "all UNE-P orders...." This is simply not the case. In fact, SWBT has demonstrated that the sequencing error arose only in specific circumstances and affected a limited number of lines.

together, these comparisons demonstrate that, over the June-July time frame, electronic trouble tickets could have been opened on a minimum of 99.5% of the UNE-P records contained in the LMOS database. Attachment A provides results for the comparisons that have occurred since SWBT's MO/AR 271 Application was filed, further confirming these overall results. This evidence demonstrates that, at any given time, CLECs were able to open electronic trouble tickets on 99.5% of their UNE-P lines.[2]

9. In addition, AT&T has not challenged the results of SWBT's analysis of the 53 telephone numbers provided by AT&T to SWBT on May 25, or the 10 numbers provided on July 9th. AT&T claimed that it was not properly listed as the service provider for these numbers. SWBT's investigation established that the LMOS update on 75% of the numbers cited by AT&T properly posted to LMOS on the day of conversion (i.e., Day 0), and that the remainder posted the following day.[3]

10. As noted in the LMOS Affidavit, a conference call was held with AT&T on July 27, 2001 to discuss the results of the above investigation, as well as LMOS issues generally.

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[2] AT&T and WorldCom both claim that a CLEC cannot open an electronic trouble ticket on a UNE-P line unless the LMOS line record reflects the CLEC as the service provider. AT&T's Willard/Van de Water Decl. ¶¶ 11, 17-18; WorldCom Comments at 14. That claim is wrong. CLECs have had the ability to open trouble tickets before the CLEC is reflected as the service provider in LMOS since March 18, 2000. This capability is described (among other places) in the LMOS Aff. ¶ 33, the Lawson MO/AR Aff. ¶ 207 (App. A-AR, Tab 13 and App. A-MO, Tab 14 to SWBT's initial AR/MO Application), the CLEC Handbook, and was specifically referenced by the FCC in granting SWBT's Texas 271 Application. See, Memorandum Opinion and Order, Application by SBC Communications Inc., et al., Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas, 15 FCC Rcd 18354, 18458-59 & n. 568 (2000). As set out in the Texas order, this capability was implemented in response to complaints from both AT&T and WorldCom.

[3] See LMOS Aff. ¶¶ 38-39 & Attach. H. In its comments, AT&T wrongly claims SWBT failed to provide "documentation or underlying detail to support its assertion that more than 70% of the of the orders updated to LMOS on the same nightly cycle as the "D" order." AT&T's Willard/Van de Water Decl. ¶ 23, n.6. In fact, for each of the 140 telephone numbers reviewed by SWBT, Attachment G to the LMOS Affidavit provides Market Area; CLEC MCN; Telephone Number; D Service Order Number; D Service Order Completion Date; C Service Order Number; C Service Order Completion Date; C Service Order Post Date in SORD; LMOS Record Update Start Date; Date LMOS Record Update Start compared to Completion Date of Order and Type of Conversion. Similar detail is provided for all telephone numbers referenced in Attachment H as well. This level of detail stands in stark contrast to the summary charts provided as Attachments 1 and 2 to the Willard/Van de Water declaration (which provide no detail information on the orders or telephone numbers in question) and the complete lack of any underlying information on the sample of Texas orders tested by AT&T.

LMOS Affidavit, ¶40. Subsequently, on July 31, AT&T asked SWBT to investigate the LMOS status of an additional 10 telephone numbers (out of a sample of 292 tested by AT&T) on which AT&T had received the "not part of your customer profile message."[4] The results of that investigation were discussed with AT&T in a conference call on August 15, 2001.[5]

11. It therefore was with some surprise that SWBT learned, upon receiving AT&T's Reply Comments that, at the same time SWBT and AT&T were discussing the telephone numbers referenced above, AT&T apparently was attempting to open "pseudo-trouble tickets"[6] on Missouri UNE-P lines for two additional sample periods. Although AT&T chose not to discuss the results of those attempts prior to filing its comments in this proceeding, AT&T now contends that its results demonstrate that SWBT's LMOS update process is not timely.

12. First, on Saturday, July 28, AT&T states that it attempted to open trouble reports on all 100 Missouri UNE-P orders for which it received a service order completion (SOC)

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[4] As discussed in the LMOS Aff. n. 20, if a CLEC attempts to open an electronic trouble report on a UNE-P line that is shown by LMOS as belonging to another service provider, the CLEC will encounter the message "Our records indicate this account is not part of your company profile. Do you wish to continue with this transaction?" AT&T argues that, if the CLEC clicks "yes," SWBT will "investigate and verify whether the CLEC is the actual 'owner' of the circuit before it takes action on the trouble report." See AT&T's Willard/Van de Water Decl. ¶ 18, see also, DOJ Comments at n. 43. This contention is false. If a CLEC submitting such a report clicks "yes" upon receiving the "not part of your company profile" message, the trouble report is processed and worked regardless of the identity of the service provider reflected in LMOS. SWBT does not verify ownership of the record on electronic reports before working the trouble.

[5] See LMOS Aff. ¶¶ 40-41 & Attach. H.

[6] Upon entry of the 10-digit telephone number, the TBTA user either receives a message reflecting the status of the line in LMOS (i.e., either the "This TN has been disconnected or ported out. No information available" message, or the "Our records indicate this account is not part of your company profile. Do you wish to continue with this transaction?" message) or it receives the trouble entry screen, into which it enters a description of the trouble, contact information, etc. See, ¶ 51 and n. 31 below. SWBT understands that AT&T simply entered telephone numbers into TBTA, and recorded those instances when it received one of these a messages rather than the trouble entry screen. SWBT does not believe any actual trouble tickets were submitted by AT&T in this process. Notably, while AT&T seems to have submitted a vast number of "pseudo-trouble tickets" in an attempt to determine whether the LMOS record had been updated, not once in its comments does it cite an instance where it was unable to open an electronic trouble ticket to report an actual end user trouble.

during the week of July 23 to 27. AT&T claims to have found that it received the "disconnected" message on every telephone number for which it received a SOC on July 25, 26, or 27. See AT&T's Willard/Van de Water Decl., ¶ 20.

13. Similarly, on Wednesday, August 29, AT&T states that it attempted to open trouble reports on all 310 UNE-P orders in Missouri for which AT&T received a SOC between August 20 and 28. AT&T claimed that it could not open trouble reports on any telephone number for which it received a SOC on August 27 or 28. See AT&T's Willard/Van de Water Decl., ¶ 22.

14. From these two instances, AT&T draws the conclusion that "the LMOS records for Missouri UNE-P customers are not updated until at least 3 business days after completion of the UNE-P conversion." See AT&T's Willard/Van de Water Decl., ¶ 23. AT&T is wrong.

15. The results of AT&T's tests were impacted by the fact that AT&T chose to run the test during the processing period for its CABS UNE-P bills. AT&T's CABS bill period for Missouri UNE-P orders is the 25th. This means that all service orders that complete before the 25th calendar day of the month should appear on the bill for that month. Data for the bill is pulled three to four business days after the bill date, in order to allow time for all service orders that completed before the 25th to post to CABS. Service orders that complete in this three-to-four day processing period (and therefore are supposed to appear on the following month's bill), are held in "interim status" and not allowed to post to CABS until after the bill processing period ends. At the end of the period, the orders post to CABS and are passed to the downstream systems, including LMOS.

16. The 25th bill processing period ended on July 30 and August 29, respectively. Given that AT&T conducted its Missouri TBTA testing on July 28 and August 29, it is not surprising that orders which completed on or after the 25th of either month had not posted as of the time the test was conducted. Notably, AT&T was able to open a pseudo-trouble ticket electronically on 100 percent of the telephone numbers for which it received a SOC on August 24, which is three business days before August 29 and, importantly, the day before the orders are held in interim status for billing purposes.[7]

17. By contrast, when AT&T attempted to open pseudo-trouble tickets on its Texas orders on August 31 – after the close of the bill period – it found very different results.[8] Specifically, in Texas on August 31, AT&T was able to open electronic trouble tickets on 62% of the orders for which it received a SOC on August 30 (i.e., one day after completion), and AT&T found that more than 95% of the orders were fully updated within three days of completion.[9]

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[7] Thus, AT&T's claim that it could not open a trouble ticket until more than three business days after it received a SOC is contradicted by its own data.

[8] In Texas, in addition to the 25th bill period, AT&T uses the 5th bill period for some of its UNE-P accounts. Since mid-July 2001, SWBT has been working orders from AT&T to transfer certain of its Texas UNE-P accounts from the 5th to the 25th billing period. In order to accomplish the transfer, C orders are issued, removing up to 25 UNE-P lines per order from the CABS BAN associated with the 5th billing period, and transferring those lines to a different BAN associated with the 25th billing period. In response to a September 6, 2001 inquiry from AT&T, SWBT has determined that when the C order posted to LMOS, the name and user address associated with the first line on the order was populated on the LMOS records for all lines on the order. SWBT estimates that this issue has affected approximately 2,800 LMOS UNE-P line records, which SWBT plans to correct electronically by October 15, 2001. In the meantime, SWBT has discontinued processing orders to change CABS BANS until it can ensure that the LMOS name and end user addresses will be appropriately populated upon transfer from one BAN to another in the CABS billing system. SWBT intends to advise AT&T of this issue via e-mail by no later than October 3, 2001, including the fact that trouble tickets on these lines should open electronically and be tracked in the appropriate performance measurements.

[9] Because AT&T failed to provide any detail on its Texas sample, SWBT was unable to determine what, if anything, might have occurred on the orders which AT&T claims were in error status as of September 7. Indeed, given AT&T's incorrect claim that SWBT did not provide supporting detail for its analysis of numbers AT&T previously provided to SWBT, AT&T's failure to offer any specific information about its Texas sample – and its decision to provide only summary tables regarding its Missouri samples – is surprising.

18. AT&T's Texas results compare favorably with the results reported on SWBT's sample of 140 CLEC telephone numbers. SWBT's sample showed that for almost 55% of the 140 lines the LMOS record was updated on the day of completion and was available for trouble reporting purposes the next day (Day 1). More than 82% were available for trouble reporting purposes within three days of completion.[10]

19. As set out in Attachment B, similar results were obtained by SWBT in its review of a new, random sample of 285 CLEC orders from throughout its five-state region.[11] Of these orders, 187 (66.31%) updated to LMOS on the day of installation, in the same nightly cycle as the D order. This means that the LMOS line record was complete for any trouble reports that may have been submitted on Day 1 – the first business day after completion. Of the 282 orders reviewed by SWBT, 97.16% were fully updated and available for trouble reporting purposes on Day 3 – again, closely matching AT&T's own findings in Texas.

20. Even more importantly, on two consecutive weeks in September, SWBT replicated AT&T's methodology for assessing updates to the LMOS database. Specifically, for the weeks of September 10-14 and 17-20, SWBT identified AT&T Missouri UNE-P service orders which had completed in SORD (and for which a SOC therefore had been returned to AT&T).[12] On Saturday, September 15 and Friday, September 21, SWBT attempted to open pseudo-trouble tickets on each set of completed orders.

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[10] LMOS Aff. ¶ 37 & Attachment G.

[11] For three of these orders, SWBT was unable to determine the date on which LMOS was updated.

[12] For September 10-14, SWBT believes it identified all AT&T Missouri UNE-P conversion orders that completed in SORD for that week. Due to scheduled database maintenance activity, SWBT was unable to obtain completion information on AT&T's UNE-P orders for Friday, September 21. Accordingly, SWBT's second sample includes AT&T UNE-P completions for Monday through Thursday, September 17 – 20. As a result of the same database maintenance activity, SWBT was only able to test *** *** of the total *** *** AT&T UNE-P orders identified by SWBT as completed on Thursday, September 20.

21. As set out in Attachment C, on Saturday, September 15, SWBT was able to open a pseudo-trouble report via TBTA on 100% of the AT&T UNE-P orders that received a SOC in the September 10-14 time frame; SWBT did not receive a single "disconnected" or "not part of your company profile" message. This means that electronic trouble reports could have been opened on 100% of AT&T's completed orders, and that 100% of those orders – even those that completed on Friday – had appropriately updated to LMOS.

22. On Friday, September 21, SWBT was able to open pseudo-trouble reports on 100% of the orders that had completed over the prior four-day period. On three of those orders, SWBT received the "not part of your company profile" message. As discussed in the LMOS Affidavit, if AT&T had encountered such a message, it would have been given the option of proceeding to submit the report electronically, or of calling the report in manually. LMOS Affidavit, ¶33, n. 20.

23. Attachment D reflects similar results for Navigator's Arkansas UNE-P orders over the same time frames. On Saturday, September 15, SWBT was able to open pseudo-trouble tickets on all but one of the UNE-P orders completed the prior week. SWBT investigated that one number and determined that the wrong telephone number was typed into TBTA. As a result, SWBT accidentally opened a pseudo-trouble ticket on a number that had been correctly in disconnected status in LMOS since January 2001. SWBT then investigated the number it intended to test and determined that it was correctly updated in LMOS on the day of installation.[13]

[13] SWBT validated its test results to ensure that it correctly entered all of the other telephone numbers tested into TBTA.

24. On Friday, September 21, SWBT was able to open trouble tickets on identified orders that completed over the prior four-day period.[14] On one order, which completed on September 18, SWBT received the "not part of your company profile message." As noted above, if Navigator had encountered such a message in attempting to open an electronic trouble report, it would have been given the option of proceeding to submit the report electronically, or of calling the report in manually.

25. All of this evidence, including AT&T's own sample of Texas orders, demonstrates that a significant percentage of orders update to LMOS within the first three days, with very few records left in disconnected status. Thus, AT&T's concern that "the failure of SWBT to update LMOS records . . . will prevent CLECs from submitting trouble tickets electronically for at least the first three business days following completion of the order" is unfounded. See AT&T's Willard/Van de Water Decl., ¶ 32.

LMOS/CABS DATABASE COMPARISONS

26. In its comments, DOJ compared the number of records updated in the LMOS/CABS database comparisons on June 6, July 19 and August 2 with the growth in CABS UNE-P records since the previous comparison, and found what it termed an "error rate" of 13%, 24%, and 26% respectively.[15] DOJ notes that because its calculation is based on the net growth in UNE-P lines between database comparisons, it overstates errors as a percentage of new orders. This is because net growth in UNE-P lines does not reflect the total CLEC UNE-P line activity that could have resulted in a disconnected LMOS line record during the same period.

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[14] As a result of the database maintenance activity mentioned above, SWBT was only able to test *** *** of the total *** *** Navigator UNE-P orders identified by SWBT as completed on Thursday, September 20.

[15] See DOJ Comments at 9 n.36; LMOS Aff. Attachs. C-E.

27. DOJ's observation is accurate. LMOS Aff. Attachs. C-E and Attachment A reflect only net UNE-P growth between database comparisons (i.e., UNE-P lines gained less UNE-P lines lost). Accordingly, they do not include enough information to make a valid comparison between the number of disconnected records updated in a LMOS/CABS database comparison, and the total UNE-P line activity occurring since the previous comparison and update process. To make such a calculation, it is necessary to compare the number of disconnected records to all UNE-P activity that could have led to an incorrectly disconnected record in the time period between LMOS/CABS database comparisons

28. Each of the following activity types has the potential to result in a disconnected LMOS line record that would be updated in a subsequent LMOS/CABS database comparison:[16]

- UNE-P New Connects;[17]
- Conversions of service from SWBT retail or CLEC resale to UNE-P;
- CLEC-to-CLEC UNE-P conversions;

[16] The potential for a disconnected LMOS line record arises from the fact that these activity types involve both inward and outward action. For example, on retail to UNE-P conversions, when the D order posts to LMOS the end-user line record is put into disconnected status – this is outward activity. When the C order subsequently posts, it establishes the new carrier as the service provider, and places the record into working status. This is inward activity. Service orders on UNE-P lines with inward activity are designated with an "Inward Action Code." An improperly disconnected LMOS record may result if the inward and outward activity is not processed correctly on these transactions.

[17] In the case of a UNE-P New Connect, there would be no outward activity associated with the order itself. However, the LMOS database maintains a disconnected line record for previously assigned telephone numbers. On a UNE-P new connect using a previously assigned telephone number, the disconnected LMOS line record is updated with the C-in order. Therefore, if the C-in order does not post, the CLEC could encounter an improperly disconnected LMOS line record if it attempted to open a trouble ticket electronically on that line. LMOS must build an entirely new line record for UNE-P new connects that use new, "previously unassigned" telephone numbers. Because line activity on a UNE-P new connect with a previously unassigned number cannot result in a disconnected record in the LMOS database, RBQ USOCs with Inward Action Codes on previously unassigned telephone numbers were excluded from the denominator of the calculation used to compare the number of UNE-P line records updated in the LMOS/CABS database comparison to the total UNE-P line activity during the period in question.

- CLEC UNE-P Billing Account Number (BAN) changes (i.e., the movement of UNE-P lines from one BAN to another);
- CLEC UNE-P Outside Moves (i.e., movement of service to new address);
- Changes to establish Hunting on existing UNE-P lines; and
- Changes to Telephone Numbers on existing UNE-P lines.

29. The last five CLEC line activity types would not result in any growth in CLEC UNE-P lines, because they involve activity on already-existing UNE-P accounts. Further, as noted by DOJ, because growth in UNE-P lines is a function of both gain and loss of UNE-P end users, net growth alone will not reflect all UNE-P New Connects and conversions of service from SWBT retail or CLEC resale to UNE-P occurring in a given period.

30. In order to determine total CLEC UNE-P line activity resulting from each of the above activity types, SWBT reviewed the LMOS service order file[18] for every nightly update cycle that occurred between the August 2, August 21, September 10 and September 18 LMOS/CABS database comparisons. This same review also was conducted for the June 6 and July 19 database comparisons for the Houston and San Antonio Market Areas.[19]

[18] File Name: LMOS@.BE40211A.PACKETOT.

[19] The LMOS@.BE40211A.PACKETOT service order files for the June 6 and July 19 database comparisons were not available for the other SWBT Market Areas. A new generation – or version – of this file is created for every LMOS nightly update cycle (5 days a week). These files are typically retained for approximately 60 generations (5 update cycles a week, for 12 weeks). When the retention limit is reached, the oldest file is erased and the next generation is created. Older data was available for Houston and San Antonio due to a difference between the way the service order files were set up for these market areas, as compared to the files in the other market areas. Reported performance measurement results cannot substitute for this source of data. No performance measurement presents the total CLEC UNE-P line activity that could result in a disconnected LMOS UNE-P line record separate from any other type of CLEC UNE-P line activity. SWBT does not believe the scope of the Texas LMOS Audit encompasses a historical review of the LMOS/CABS database comparison. Data to be used in the Texas Audit for verification of performance measurements is stored in the ASKME database; data in ASKME is retained for a three-year period and is sufficient for purposes of the Texas Audit.

31. In each service order file, the UNE-P lines were identified through use of the Uniform Service Order Code (USOC) "RBQ." The activity types identified in paragraph 3, above, were then identified by the presence of an Inward or "I" Action Code. All RBQ USOCs with an Inward Action Code since the last database comparison were then totaled. These totals are reflected in Attachment E, under the heading "Total CLEC UNE-P Line Activity."

32. DOJ uses the term "error" to refer to the number of LMOS line records updated in an LMOS/CABS database comparison. SBC also unfortunately used that term in its September 21 ex parte letter. In fact, LMOS records found to be disconnected in LMOS, but working in CABS at the time of a database comparison are updated, regardless of whether the disconnected status is truly an error or just simply part of the normal update process. In other words, the comparison and update process includes disconnected LMOS records that, but for the comparison and update, would have updated automatically on a subsequent day as part of SWBT's normal system processes.

33. The numbers appearing under the heading "Percent Updated" on Attachment E were calculated by dividing the number of LMOS UNE-P line records updated in the specified database comparison (the "Number Updated" in Attachment E) by the "Total CLEC UNE-P Line Activity" occurring since the previous database comparison. As such, this percentage is a far more accurate representation of the relationship between the number of UNE-P Line records updated in SWBT's LMOS/CABS database comparisons and the total UNE-P line activity that could have resulted in the need for such an update at the time of the comparison than the DOJ's calculation.

34. The numbers appearing under the heading "Total Order Activity Factor" represent the ratio between the "Total CLEC UNE-P Line Activity" and the "Net Growth From Last Comparison." This factor reveals that, as DOJ anticipated, using "Net Growth From Last Comparison" is not an appropriate means of assessing the accuracy of order posting to LMOS, because there is no constant relationship – either across states or between comparison periods – between the net growth and the actual amount of CLEC UNE-P line activity that could have resulted in an incorrectly disconnected record in LMOS.

35. In its Comments, DOJ suggests that "new LMOS errors have continued to rise at an increasing rate." DOJ Comments at 9. DOJ also points to "error rate" differences between Texas and the MOKA states, suggesting that these differences raise questions "about the consistency of SBC's manual error correction between states."[20] In fact, as noted in Attachments A & E, the differences between market areas in the number of LMOS records updated in the LMOS/CABS database comparisons are attributable to specific systems issues with region-wide effects – which SWBT either has corrected or is in the process of investigating in order to develop solutions – that happened to affect particular market areas during one comparison or another.[21] For example, the Houston (7/19, 9/10 and 10/1) and San Antonio (8/2 and 10/1) results were impacted by the CF114 file issues, discussed below.[22] The San Antonio (7/19) and Dallas (8/2) results were impacted by the BE294 programming issues identified in the LMOS Aff. n. 18, while the Dallas 9/18 results were impacted by a new BE294 programming issue that SWBT

[20] DOJ Comments at 9-10.

[21] One such issue corrected by SWBT is the "CABS D" service order issue discussed at ¶ 22 of the LMOS Aff. Additional detail concerning that issue was provided in response to FCC Question No. 3 in SBC's October 1, 2001 ex. parte. A copy of SBC's response to Question No. 3 appears as Attachment L to this affidavit.

[22] See discussion, ¶ 43 below and Attachment A-2.

currently is attempting to isolate and correct.[23] The results for San Antonio on 9/10 and 9/18 were impacted by the inadvertent use of an out-dated CABS file[24] and, finally, Kansas results on 10/1 were impacted by issues related to the creation of certain CABS BANs.[25]

36. Notably, the impact of any of these issues on overall accuracy of the LMOS database was minimal. Further, even the Percent Updated numbers reflected on Attachment E do not represent an accurate calculation of the number of LMOS line records in "error" status. As explained above, because the comparison and update process involves a snapshot of the LMOS database, it will find instances in which a line is working in CABS but disconnected in LMOS for reasons unrelated to any error condition. Such lines would be updated to working status in LMOS through the normal, automated posting of the C order on a night subsequent to the comparison and update. Nonetheless, they will be recorded as having been updated through the comparison process.

ELECTRONIC TROUBLE REPORT SUBMISSION

37. DOJ states that it has focused on the rate of errors for new orders in LMOS, rather than the total errors in LMOS, "because new orders are particularly vulnerable to any problem." DOJ's concern seems to be based, at least in part, on AT&T's assertion that "most of the troubles AT&T's customers experience occur within the first 72 hours of provisioning." SWBT's data establishes that both of these contentions are unfounded.

38. First, in the June through August timeframe, AT&T experienced trouble on only 1.63 percent of its UNE-P service orders (*** *** trouble reports on *** ***

[23] See Attachment A-4

[24] See Attachments A-2 & 3.

[25] See Attachment A-4.

orders) within ten days of installation (PM 35), with only about a third of those trouble reports being submitted within three days of installation.[26] This handful of tickets represents less than 0.55 percent of AT&T's UNE-P service orders and about 2.3 percent of all of AT&T's trouble tickets submitted during these months. See Attachment H. Based on this actual data, it is clear that the vast majority of AT&T's customers experience no troubles and the small minority of customers who do experience trouble generally do not experience it within the first 72 hours after provisioning.

39. Second, SWBT's data also establishes that CLECs are able to open a very high percentage of UNE-P trouble tickets electronically within the first 3-5 days after installation. In addition to the TBTA test discussed above, SWBT also has estimated the potential effect of any possible delay in the posting of "D" and "C" orders to LMOS, using data from its performance measurements on the posting of "C" orders to CABS.[27] As explained in the LMOS Affidavit:

> [O]n a nightly basis (during the business week), CRIS program BJ501 produces a file containing information on all service orders posted to CRIS and CABS for that business day (referred to as the "BJ501 file"). The BJ501 file is made available that night to other systems, including LMOS and SORD, for posting. SORD will reflect the next business day as the posted date.

LMOS Affidavit at n.7 (emphasis added).

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[26] In fact, from June through August, CLECs in SWBT's five-state region submitted trouble tickets on only 0.77% of lines with service order activity during the first three days after installation. Due to a minor calculation error, SWBT previously represented this figure as 0.75% percent. See Ex parte Letter from Geoffrey M. Klineberg to Magalie Roman Salas, Secretary, FCC (FCC filed Oct. 1, 2001).

[27] See LMOS Aff. Attach. F. Attachment J updates LMOS Aff. Attach. F Table 1 through August, and provides the raw data from PM 17.1 used to make these calculations. Delay in the posting of service orders to CABS can result from a number of different causes, including implementation of planned releases; programming for rate changes; maintenance/conversion activity; unexpected system performance issues, service order error, etc. Any of these occurrences could result in posting delays that could impact the monthly average for posting on Day 1, Day 2, etc. However, in response to DOJ Comments at 10 and n. 39, SWBT notes that the correction of the LMOS sequencing error (so that D service orders are designed to process in LMOS after SORD completion) would have had no impact on the length of time required for the C order to post to the CABS database, or to update LMOS.

40. Because SORD reflects the first business day after posting as the posted date, the "C Service Order Post Date in SORD" in Attachment G to the LMOS Affidavit is one business day after the "LMOS Record Update Start Date" for each of the 140 CLEC UNE-P conversion orders reviewed. (The same is true of the sample of August CLEC UNE-P conversion orders presented in Attachment B).

41. This fact also explains why SWBT's performance measurement data for CABS posting (PM 17.1) does not show any "C" orders posting to CABS on the day of installation (i.e., Day 0), even though a high percentage of "C" orders actually post to LMOS (after posting to CABS) on the day of installation. See LMOS Aff. Attachs. F at 1 and G; see also Attachs. B and G to this affidavit.

42. Nonetheless, because posting data was most readily available – and because it presented a conservative approach to estimating LMOS posting timeliness – SWBT used the CABS posting data for its "lag" analysis. In doing so, SWBT also made a number of other conservative assumptions:

- First, SWBT assumed that no "C" orders posted to LMOS on Day 0 because the CABS posting data shows no orders posting on that day, even though direct examination of LMOS showed a high percentage of such orders posting correctly to LMOS on Day 0. See LMOS Aff. Attach. F at 3.
- Second, SWBT also assumed that a "C" order posted successfully to LMOS on the same day that it showed as posting in CABS in the performance data. See id. Attach. F at 2.

43. Upon further investigation, SWBT can now confirm that orders completed in CABS on a given night may not always be included as part of that night's BJ501 file that is sent to

LMOS and other downstream systems. If, in a given market area within the SWBT region, the CABS order processing run is longer than the CRIS order processing run that night, there is a chance that the market region's CABS output file (CF114) will be included in the following night's BJ501 file. The fact that a CF114 file in one area is included in the following night's BJ501 file, however, does not impact the CF114 files in the other six SWBT market areas. SWBT is unable to quantify precisely the frequency with which the CF114 file in any given market region will be included in the following night's BJ501 file, but conservatively estimates that it occurs less than 30 percent of the time.

44. For a number of reasons, this alteration to the assumption used in SWBT's analysis does not materially alter the results of that analysis:

- First, the use of CABS posting data to approximate LMOS posting data already likely overstates the true LMOS posting date. As noted above, if a "C" order posts correctly to LMOS the same night that it posted to CABS, the posting date for performance measurement purposes will be recorded as one business day after the actual CABS and LMOS posting date. In fact, in Attachment F of the LMOS Affidavit, the assumption was that no orders submitted on day 1 could be opened electronically.
- Second, LMOS Affidavit Attachment F includes an analysis using only June CABS posting data. Although June posting data showed a much lower percentage of orders posting on Day 1 than in prior months, but a comparable percentage of orders posting by Day 3, the estimated percentage of trouble tickets potentially impacted increased by only 0.47 percent.

45. Finally, SWBT has re-run its analysis using actual LMOS posting data, based on the set of 140 UNE-P conversion orders from July 2001, detailed in Attachment G to the LMOS Affidavit, and another set of 282 UNE-P conversion orders from August 2001, detailed in Reply Attachment B to this affidavit. This analysis reveals that:

- CLECs can expect to have 1.1 percent of all the trouble tickets they submit affected by a delay in posting – put another way, the lag should not affect 98.9 percent of those trouble tickets. See Reply Attachment G.
- At least 99.84 percent of UNE-P customers are unaffected by any posting delay. See id.
- CLECs can expect to be able to submit electronically 85.57 percent of the tickets submitted on Days 0 through 5. See id.

46. In other words, basing SWBT's analysis directly on LMOS posting data – rather than indirectly on the CABS posting data in the performance measurements – not only provides a truer picture of the extremely minimal impact of any posting delay on the ability of CLECs to open electronic trouble tickets, but also shows that the SWBT's earlier analysis overestimated the impact of this delay.

47. This analysis demonstrates that the "lag" could have prevented submission of trouble tickets on an incredibly small number of CLEC trouble tickets. For example, in Missouri in July, SWBT processed 3,929 UNE-P service orders that could have generated a trouble report within the first 5 days. During the June through August time period, only 1.14 percent of all UNE-P service orders had a trouble ticket submitted within the first five days.[28] Applying that percentage to Missouri's July UNE-P service order activity results

[28] Due to a minor calculation error, SWBT previously represented this figure as 1.11 percent. See Ex parte Letter from Geoffrey M. Klineberg to Magalie Roman Salas, Secretary, FCC, Attach. G (FCC filed Oct. 1, 2001).

in approximately only 45 trouble tickets issued on these service orders within the first five days after provisioning.

48. Based on the analysis described above, however, approximately 38 or 39 of those 45 trouble tickets could have been opened electronically, and therefore would not have been affected by any posting delay. The remaining approximately 6 or 7 trouble tickets, on which a CLEC would have encountered a disconnected LMOS line record at the time it attempted to open a trouble ticket electronically, account for only 0.18 percent (i.e., less than 2/10 of one percent) of the new UNE-P service order activity for the month.

49. As of July, there were approximately 60,904 CLEC UNE-P lines in Missouri. It is hard to see how the possibility that CLECs might not have been able to open an electronic trouble ticket on 7 lines during that month – 0.01 percent of the total number of working CLEC lines – can legitimately be regarded as impacting CLECs' ability to complete. Notably, no commenter in this proceeding points to a specific instance in which it was unable to report an actual end user trouble electronically.

MANUAL PROCESSES

50. AT&T contends that when a CLEC attempts to submit an electronic trouble ticket on a UNE-P line and encounters a disconnected LMOS record, it is required to submit the ticket twice – first electronically, then manually – delaying the submission of the trouble ticket.[29] DOJ also notes that SWBT's calculation of time to clear on manually submitted trouble reports failed to include any of the time between its receipt of the trouble ticket and the entry of that ticket into LMOS.[30] In fact, there is almost no delay involved.

[29] See AT&T's Willard/Van de Water Decl. ¶ 27

[30] DOJ Comments at 10, n. 42.

51. When a trouble report is entered into TBTA, the 10-digit telephone number is first entered into the specified field. The "Enter" key then is depressed on the keyboard (or the "Report Trouble" button is clicked on the screen). TBTA immediately returns either the trouble entry screen (meaning that submission of the trouble may continue)[31] or a message reflecting the status of the line in LMOS.[32] Full submission of the electronic ticket is not required in order for the CLEC to determine the status of the LMOS line record. Depending on the typing skill of the operator, the time spent in TBTA when a disconnected message is encountered is approximately 5 to 10 seconds. The simplicity of this process is demonstrated by AT&T's own significant experience in submitting pseudo-trouble reports on lines in perfect working status.

52. The LMOS Affidavit established that as long as the CLEC does not delay in submitting a manual trouble report after the receipt of the above notification message, it should receive the same commitment time for repair that would have been received if the report had been submitted electronically.[33] In Version 1.6 of the Performance Measurements, PM 24 measured the LOC's average speed of answer. While PM 24 was eliminated by Version 1.7 of the business rules, the LOC has continued to track this data. SWBT's

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[31] When the TBTA trouble entry screen appears, the TBTA user types in the trouble type (which represents the trouble condition, such as NDT for "No Dial Tone") End User contact information and trouble narrative, which provides additional diagnostic information. The final step is to depress the "Enter " key on the keyboard or click the "Issue" button on the screen. The trouble ticket is then issued, with commitment time automatically provided.

[32] See n. 6 above.

[33] AT&T continues to complain – with no supporting evidence – that a manually submitted report could be delayed if (for example) the SWBT representative declined to undertake the repair because he/she believed the CLEC requesting the repair was not the true "owner" of the loop." AT&T's Willard/Van de Water Decl. ¶ 28. AT&T made similar complaints in May, to which SWBT responded by reviewing the proper procedures for taking such tickets with all LOC customer service representatives. LMOS Aff. n. 27. AT&T has not come forward with any specific instances of trouble reports not being taken by the LOC due to AT&T not appearing as the service provider in LMOS. As noted in the LMOS Affidavit, if AT&T or any other CLEC encounters a situation in which a manual trouble report appears to have been improperly rejected, the CLEC should contact LOC management using the escalation list provided to them by their account manager.

average speed of answer for May was 8.3 seconds; June was 30.1 seconds; July was 17.0 seconds and August 14.1 seconds. Thus there is virtually no delay for the CLEC in waiting for the LOC to answer a call to submit a manual trouble report.[34]

53. In addition, SWBT's LOC undertook a study of 200 random calls received from CLECs between August 20-23 (including calls to report trouble, check on the status of outstanding reports[35] and orders, and requests for MLT testing). Based on this study, once the CLEC's call is answered by the LOC Customer Service Representative (CSR), the LOC average "talk time" was approximately 3 minutes and 23 seconds. During this average "talk time," the CSR typically confirms the trouble description, CLEC contact information, End User contact information, and the test results of Mechanized Loop Testing (MLT) before submitting the trouble report.

54. The LOC CSR's computer terminal has multi-screen capabilities. In situations where the LMOS record has not been updated with the CLEC's information, this multi-screen capability enables the LOC CSR to review SORD records for recent service order activity, and to obtain the correct AECN and class of service for the reported telephone

[34] In addition, Performance Measurement 25: LOC Grade of Service (GOS) measures the percentage of calls to the LOC answered within 20 seconds on an aggregate, five-state basis. SWBT's results on PM 25 for the past 4 months are May 89.9%, June 63.9%, July 79.9%, August 80.7%. The June GOS results were negatively impacted by heavy rains and flooding in the Houston area. The LOC handled 8,320 more calls in June than were handled in May. The SWBT retail Customer Service Bureaus (CSBs) were impacted as well, moving from 86.8% in May to 70.0% in June.

[35] AT&T and WorldCom claim that it is more difficult to track the status of a manually reported trouble ticket, as it can only check the status by calling SWBT. See AT&T's Willard/Van de Water Aff. ¶ 30; WorldCom Comments at 15. See also, DOJ Comments at 10, n. 42. Because manual trouble tickets are resolved, on average, in a day, it is hard to see how calling to check on status would be more than a minimal inconvenience. SWBT's LOC utilizes an Interactive Voice Response (IVR) system, which allows CLEC s to call the normal maintenance number (800-220-4818) and select menus to obtain the trouble ticket status option. Once at the status option, the CLEC representative can type in the 10-digit telephone number and receive a computer generated voice response on the trouble report status for that number. The status of a trouble ticket can be obtained through the IVR regardless of the status of the telephone number in LMOS. See, Accessible Letter CLEC01-232, "(Maintenance and Repair) Local Operations Center (LOC) Interactive Voice Response (IVR)," dated August 15, 2001.

number, while the MLT test is running.[36] "Talk time" for trouble reports where the LMOS record was not updated averaged 3 minutes and 57 seconds. Finally, LOC CSRs were able to completely submit the trouble report during the "talk time," or within 30 seconds of ending the call.[37]

55. Thus, in total, a CLEC can enter a TN in TBTA, incur an error, contact the LOC to report the trouble manually and have the trouble ticket entered into SWBT's repair system in an average of four to five minutes.

56. Attachment I to the LMOS Affidavit established that from June 2000 through June 2001, the difference in time between the receipt of a UNE-P trouble ticket and the time the trouble was cleared, was actually less for manual tickets than for electronic. Attachment I to this affidavit establishes that this fact remains true for July and August 2001 as well. Even considering the additional four to five minutes, on average, to submit a trouble ticket manually, the fifteen-month average time to clear on manual tickets (23.82 hours +

[36] As discussed in the LMOS Affidavit ¶ 52, when the LOC takes a manual trouble report on an LMOS record in disconnected status, the LOC service representative enters a narrative onto the trouble ticket containing the CLEC's four digit Alternate Exchange Carrier Number (AECN) and the account class of service. SWBT's systems are programmed to capture the CLEC AECN and class of service from the narrative entered by the LOC, thereby allowing trouble reports to be included in the correct CLEC performance measurements regardless of whether the LMOS record has been updated.

[37] When a trouble report is manually submitted and the LOC (CSR) determines that the LMOS record is not completely accurate, the CSR fills out an LMOS Database Resolution Center (LDRC) form which is sent to the LDRC for LMOS line record correction. These forms are designated "high priority" when the CSR determines that the LMOS line record: 1) does not indicate the correct CLEC; 2) does not provide any data; or 3) indicates the account is disconnected or unassigned. The LDRC has committed to correct High Priority LDRC forms within 24 hours if the CLEC service orders have completed/posted in the appropriate systems. See Attachment F. SWBT's LSC is responsible for correcting CLEC service orders that error in attempting to complete in SORD or post to CABS. See, Affidavit of Brian Noland. Attachment K is the LDRC methods and procedures for the manual updating of LMOS UNE-P line records. All SWBT LOC LDRC forms are worked in the three LDRC facilities located in SWBT's region. At LMOS Aff. ¶ 49, SWBT was focusing on the manual handling of LMOS errors on UNE-P records and inadvertently did not specifically note that, since April 2001, certain LMOS errors (but not the LOC LDRC form corrections) for the Kansas market area are handled by the SBC LDRC facility in Indianapolis, Indiana. Additionally, work may be shifted between the various SBC LDRC locations as necessary to efficiently allocate workload and resources.

5 minutes), would still be shorter than the average time to clear for electronically submitted reports (24.57 hours).

57. Both Attachment I to this affidavit and LMOS Aff. Attach. I show that numerous CLECs utilize both electronic and manual trouble report submissions for UNE-P lines, apparently by choice. Significantly, the percentage of trouble reports submitted electronically has remained relatively consistent both before and after May 11, 2001 (when the system enhancements and embedded database update occurred). Further the percentage of tickets submitted manually between May and August 2001 is far in excess of the number of tickets that could potentially have been impacted by a disconnected LMOS record, demonstrating that it is CLEC choice that leads to the submission of manual trouble tickets.

PERFORMANCE MEASUREMENTS

58. AT&T complains that SWBT did not include PMs 39, 39, 40 and 35.1 in its analysis of the potential impact of the LMOS sequencing issue on the performance measurements.[38] SWBT is not able to provide a restatement of the performance measurements related to trouble reporting since there is no practical way from a historical basis to determine which tickets were miss-classified to the wrong CLEC. PMs 35 - Percent I reports within 10 days, PM 37 and 37.1 Trouble Report Rate and PM 41 Repeat Reports were estimated in the original LMOS Joint affidavit in Attachment L. Since these measurements are binary (yes or no) SWBT was able to provide an estimate based on the error rate.

59. SWBT was not able to provide an estimate for Missed Repair Commitments (PM 38), Receipt to Clear Duration (PM 39), and Percent Out of Service Less Than 24 Hours (PM

[38] Willard/Van de Water Decl. ¶ 42-43.

40) since it cannot determine, on its own, which specific tickets were misallocated in the performance reports to the wrong CLEC or to SWBT.[39] Additionally, there was no evidence that the trouble reports which were misclassified would take longer to repair than the ones allocated to the appropriate CLEC. Therefore, based on the LOC processes and the amount of time it takes to open a ticket and the amount of time a CLEC must wait in queue to be answered by a technician, SWBT assumed that the repair times would have been equivalent. The assumption has been borne out by data from recent months, which demonstrates that average repair durations have remained relatively constant even though trouble tickets are now allocated more accurately, as demonstrated in the results of the data reconciliations that SWBT conducted with Birch and Logix. See LMOS Aff. ¶¶ 55-57.

60. AT&T complains that SWBT did not include data on Line Share loops in its historical analysis of the impact of the LMOS sequencing issue on the performance measurements. AT&T's Willard/Van de Water Decl. at n. 17. First, as noted in the LMOS Aff. n. 3, effective June 1, 2001, performance measurement data on the high-frequency portion of the loop (HFPL) has been pulled solely from WFA/C – not from LMOS. Second, the LMOS record on a line share loop is updated by a single C order from the CRIS billing system with C ("change") and T ("to") Action Codes that add line sharing to the voice line. Because there is no "outward" activity involved (i.e., nothing is removed from the LMOS record), there is no opportunity for a disconnection of the LMOS line record.

[39] It is SWBT's assumption that most if not all CLECs would choose to maintain a record of their trouble tickets taken from its end user customers. If a CLEC believed the data SWBT had reported was incorrect then they could request reconciliation with SWBT where the parties data could be compared. This option is and always has been open to CLECs if believe there is a discrepancy. To date no CLEC has requested data reconciliation on these PMs for the period at issue in the estimated data in Attachment L to the LMOS Affidavit.

Accordingly, LMOS UNE-P service order sequencing issues would not have impacted line share performance measurements during any time period in which such data was pulled from LMOS.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

Executed on 9-28, 2001

William R Dysart

William R. Dysart
Director – Performance Measures

STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

Subscribed and sworn to before me this 28 day of September, 2001

Kathleen Enger

Notary Public

KATHLEEN ENGER
Notary Public – Notary Seal
STATE OF MISSOURI
St. Louis County
My commission expires September 11, 2004

I state under penalty of perjury that the foregoing is true and correct. Executed on October 1, 2001.

Brian D. Noland

Brian D. Noland

STATE OF TEXAS)

COUNTY OF DALLAS)

Subscribed and sworn to before me this 1st day of October, 2001.

Mary L. Reed

MARY L. REED

Notary Public

MARY L. REED
MY COMMISSION EXPIRES
October 5, 2004

I state under penalty of perjury that the foregoing is true and correct.

Executed on October 2, 2001

Nancy L. Rentler

STATE OF CALIFORNIA
COUNTY OF VENTURA

Subscribed and sworn to before me on this _____ day of _____ 2001.

_____
Notary Public

JEREMY C. HOZINSKY
Commission # 1271944
Notary Public - California
Ventura County
My Comm. Expires Jul 27, 2004

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California
County of VENTURA } ss.

On OCTOBER 02, 2001 (Date), before me, JEREMY HOZINSKY NOTARY PUBLIC (Name and Title of Officer (e.g., "Jane Doe, Notary Public"))

personally appeared NANCY LOUISE KENTNER (Name(s) of Signer(s))

~~☐ personally known to me~~
☒ proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) ~~is/are~~ subscribed to the within instrument and acknowledged to me that ~~he/she/they~~ executed the same in ~~his/her/their~~ authorized capacity(~~ies~~), and that by ~~his/her/their~~ signature(~~s~~) on the instrument the person(~~s~~), or the entity upon behalf of which the person(~~s~~) acted, executed the instrument.

WITNESS my hand and official seal.

Signature of Notary Public

Place Notary Seal Above

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Signer Is Representing: _____

RIGHT THUMBPRINT OF SIGNER
Top of thumb here

I state under penalty of perjury that the foregoing is true and correct.
Executed on October 2, 2001.

David R. Smith

STATE OF TEXAS)
COUNTY OF TARRANT)

Subscribed and sworn to before me on this 2nd day of OCTOBER 2001.

Notary Public